

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
	)	
<b>Defendant.</b>	)	

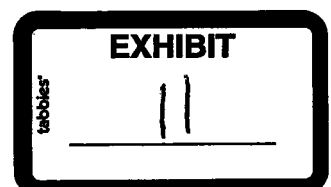
**PLAINTIFF ePLUS INC.'S FIRST SET OF INTERROGATORIES TO DEFENDANT  
LAWSON SOFTWARE, INC. FOR CONTEMPT PROCEEDINGS**

Pursuant to Rules 33 and 65 of the Federal Rules of Civil Procedure, Plaintiff ePlus Inc., ("ePlus"), hereby requests that, no later than October 7, 2011, and in accordance with the following definitions and instructions, Defendant Lawson Software, Inc. ("Lawson") answer separately, in writing, and under oath, by an officer or duly authorized agent of Lawson, the following interrogatories.

The following interrogatories are continuing, and Lawson must promptly supplement its answers in accordance with Federal Rule 26 as additional or corrective information comes to its and/or its attorneys' attention.

**DEFINITIONS AND INSTRUCTIONS**

The Definitions and Instructions sections of Plaintiff ePlus Inc.'s First Set of Interrogatories to Defendant Lawson Software, Inc., dated July 24, 2009, shall apply to all



with customers concerning their decisions regarding whether to uninstall and remove RSS and whether to install and implement RQC.

**Interrogatory No. 4:**

Describe the conception and development of RQC, including the date that the initial discussions took place regarding the development of RQC, the dates of all subsequent meetings regarding the design, development, and/or release of RQC, the dates of release of any alpha or beta or later versions of RQC, and identify all persons involved in the development of RQC and their roles in connection therewith.

**Interrogatory No. 5:**

Identify with specificity any portions of the Core S3 Procurement System source code that were modified during the development and creation of RQC.

**Interrogatory No. 6:**

Describe the process used to install and integrate RQC into the Core S3 Procurement System, including the download of the software from Lawson's website, the installation of the software on the Infringing System, the integration of the software into the Core S3 Procurement System, and any other steps necessary to implement RQC and integrate RQC, and identify the minimum time required to perform each of these steps.

**Interrogatory No. 7:**

Describe how the RSS code is removed from an S3 Procurement system and is replaced with the code for RQC.

**Interrogatory No. 8:**

Identify and describe the steps taken by Lawson to remove RSS from its customers' systems and to replace that application with RQC, and identify all customers for whom Lawson

Respectfully submitted,

September 18, 2011

/s/

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Attorneys for Plaintiff, ePlus Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of September 2011, I will serve

**Plaintiff ePlus Inc.'s First Set of Interrogatories to Defendant Lawson Software, Inc. for  
Contempt Proceedings**

on the following counsel of record as indicated via electronic mail:

<p>Daniel McDonald, <i>pro hac vice</i> Kirsten Stoll-DeBell, <i>pro hac vice</i> William D. Schultz, <i>pro hac vice</i> Rachel C. Hughey, <i>pro hac vice</i> Andrew Lagatta, <i>pro hac vice</i> MERCHANT &amp; GOULD 3200 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 332-5300 Facsimile: 612) 332-9081 lawsonservice@merchantgould.com</p>	<p>Robert A. Angle, VSB#37691 Dabney J. Carr, IV, VSB #28679 TROUTMAN SANDERS LLP P.O. Box 1122 Richmond, Virginia 23218-1122 (804) 697-1238 (804) 698-5119 (Fax) robert.angle@troutmansanders.com dabney.carr@troutmansanders.com</p>
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/s/

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